

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

JORDAN SALLASKA,)	
)	
Plaintiff,)	
)	
vs.)	Case No. CIV-06-1039-F
)	
SOUTHWESTERN OKLAHOMA)	
STATE UNIVERSITY, et al.,)	
)	
Defendant.)	

DEFENDANTS EXHIBIT LIST

COME NOW, Defendants, Southwestern Oklahoma State University (“SWASU”), Chip Diffendaffer, Brian Adler and David Misak, and for their Exhibit List would show as follows:

No.	Title/Description
1.	Forensic Analysis Report from Techno Crime Institute. (OAG Bates No. 0351-0367)
2.	Portion of Forensic Analysis Report from Techno Crime Institute pertaining to Plaintiff. (OAG Bates No. 001-008)
3.	Information obtained by Techno Crime Institute from Plaintiff’s computer. (OAG Bates No. 0098-0131)
4.	Jordan Sallaska Erotic Expressions Internet and File Activity Analysis. (OAG Bates No. 0462-0488)
5.	Erotic Expressions work flow and script document. (OAG Bates No. 0858-0866)
6.	Jordan Sallaska’s contract with Erotic Expressions. (OAG Bates No. 0069-0074)
7.	Report Summary of Plaintiff’s time sheets and her usage of Erotic Expressions website. (OAG Bates No. 0132)

8.	Jordan Sallaska Erotic Expressions Activity and Timesheet (OAG Bates No. 0421).
9.	June 18, 2003 email from Plaintiff to Todd Brunner at Wright Radio regarding KQMX website.
10.	July 3, 2003 email from Plaintiff to Brian Howland.
11.	February 10, 2005 email from Diffendaffer to Plaintiff and Wright regarding use of SWOSU resources for private business endeavors.
12.	June 20, 2005 letter to Diffendaffer and Plaintiff Re: Review of Concerns.
13.	Plaintiff's written responses to follow-up questions regarding her allegations completed on July 27, 2005.
14.	August 23, 2005 letter to Sallaska providing findings from the review of Plaintiff's concerns.
15.	December 15, 2005 Response to EEOC Notice of Charge of Discrimination.
16.	SWOSU's sexual harassment policy and EEO statement.
17.	Work emails between Plaintiff and Diffendaffer.
18.	Information on South by Southwest 2005 Conference.
19.	Web pages from the Jordan Sallaska website at www.jordansallaska.com .
20.	EEOC Charge 311-2005-01354 and contents of the file.
21.	EEOC Charge 564-2006-00116 and contents of the file.
22.	SWOSU Policies and Procedures.
23.	Plaintiff's Personnel File.
24.	Plaintiff's OESC file.
25.	Defendant David Misak's Notes from Meetings throughout the course of his investigation and involvement of Plaintiff's allegations.
26.	Plaintiff's 1099s and W-2s. (Plaintiff's Bates No. 539-560 and those yet to be produced)

27.	Parody Video shown by Defendant Chip Diffendaffer to Plaintiff and Kyle Wright.
28.	Protective Order filing in Washita County, State of Oklahoma. (OAG Bates No. 01933-01944)
29.	Defendant Chip Diffendaffer's summary of events. (OAG Bates No. 01950-01954)
30.	Notes from Meeting on October 10, 2005. (OAG Bates No. 02087)
31.	Notes from Dennis Cave. (OAG Bates No. 02093)
32.	Notes from July 19, 2005 meeting. (OAG Bates No. 02094-02098)
33.	Letter dated August 17, 2005, to Chip Diffendaffer from Brian Adler and David Misak (OAG Bates No. 02103-02105)
34.	Letter dated August 17, 2005, from Chip Diffendaffer to David Misak. (OAG Bates No. 02106)
35.	Sexual Harassment Training Information and notes from 08-18-05, (OAG Bates No. 02107-02124)
36.	Letter dated August 24, 2005 to President John M. Hayes from Lori Young. (OAG Bates No. 02126)
37.	Plaintiff's Time Sheets. (OAG Bates No. 0629-0632)
38.	Letter dated November 29, 2005, to Dr. John M. Hays, Office of the President from Brian Adler; David Misak; Tom Fagan; Darla Davenport, providing a Summary of the Review of Plaintiff's questionable activities.
39.	Letter dated November 30, 2005, to Jordan Salaska advising her of termination and her right to request a termination hearing to review the decision with Letter dated November 29, 2005, attached.
40.	Letter dated July 6, 2005, from Plaintiff to David Misak.
41.	Letter dated August 20, 2005, to Jordan Sallaska from Brian Adler and David Misak.
42.	Letter dated December 16, 2005, to Jordan Sallaska from David Misak, regarding Termination Appeal Committee Findings.

43.	Letter dated December 9, 2005, from Jordan Sallaska to President John Hays.
44.	Email Correspondence concerning the scheduling of meetings with Jordan from November 2005.
45.	Letter dated August 3, 2005, from Plaintiff requesting administrative leave.
46.	Letter dated August 23, 2005 to Plaintiff from Defendant David Misak.
47.	Letter dated August 5, 2005, to Plaintiff from David Misak.
48.	Email from Chip Diffendaffer dated February 10, 2005, sent to Kyle Wright and Jordan Sallaska.
49.	Email Correspondence between the parties and Kyle Wright.
50.	Email from Jeffrey Zeldman to Jordan Sallaska dated April 29, 2005.
51.	Email correspondence between Chip Diffendaffer and Jordan Sallaska regarding timesheet folder in July of 2005.
52.	Notes from meeting on July 8, 2005 with Plaintiff.
53.	Notes from meeting on July 19, 2005, with Plaintiff.
54.	Instant Messaging Logs.
	Letter dated August 19, 2005, to Plaintiff from Defendant David Misak.
55.	Documents presented by Plaintiff to the Review Committee during her termination appeal, including typed statements by Plaintiff; Email correspondence; Memorandum to Plaintiff's Attorney (OAG Bates No. 1779-1883).
56.	Plaintiff's Medical Records.
57.	Email Correspondence between Defendant David Misak and Plaintiff Jordan Sallaska.
58.	Email Correspondence from Defendant David Misak to Termination Appeal Committee. (OAG Bates No. 1221)
59.	Email Correspondence between David Misak and Debra Purdum. (OAG Bates No. 1225-1226)

60.	Letter dated December 16, 2005 to Plaintiff from David Misak. (OAG Bates No. 1253)
61.	Recommendation of Termination Appeal Committee. (OAG Bates No. 1255)
62.	Notification of Resignation from Defendant Diffendaffer dated September 20, 2005. (OAG Bates No. 0664)
63.	Letter from Jordan Sallaska to David Misak dated July 6, 2005. (OAG Bates No. 0832-0834)
64.	Notes from July 19, 2005 meeting. (OAG Bates No. 0884-0890)
65.	Notes from meetings regarding Tom Fagan and Darla Davenport's investigations into Defendant Chip Diffendaffer's concerns.
66.	Demonstrative Aids as necessary.
67.	All depositions taken and exhibits used therein.
68.	All documents produced by Defendants during discovery.
69.	All documents produced by Plaintiff during discovery.
70.	Plaintiff's responses to Defendants' discovery requests.
71.	All exhibits listed by Plaintiff not objected to by Defendants whether used at time of trial or not.
72.	All documents necessary for impeachment and rebuttal.
73.	Documents produced pursuant to subpoenas duces tecum not objected to by Defendants.
74.	Further exhibits to be identified in accordance with the Court's Scheduling Order.

Discovery is ongoing; thus, Defendants reserve the right to amend and supplement the foregoing as necessary.

Respectfully submitted,

s/ Tina L. Izadi

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CERTIFICATE OF SERVICE

I hereby certify that on March 24, 2008, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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